

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

OZMO LICENSING LLC,

Plaintiff,

v.

TCL ELECTRONICS HOLDINGS LTD. and
TCL INDUSTRIES HOLDINGS CO., LTD.,

Defendants.

Civil Action No. 6:23-cv-00249-ADA

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff, Ozmo Licensing LLC, and Defendants, TCL Electronics Holdings Ltd. and TCL Industries Holdings Co., Ltd. (collectively “Parties”), hereby notify the Court that the Parties have reached an agreement in principle that will resolve all matters in controversy in the above-captioned action between the Parties. The Parties, therefore, respectfully request that all deadlines between them in the above-captioned litigation be stayed for forty-five (45) days, through and including September 30, 2024, to give adequate time for the terms of the settlement agreement to be satisfied and for the Parties to file appropriate dismissal papers. The Parties request this stay, not for the purposes of any delay, but so that they may satisfy the terms of the settlement agreement and file dismissal papers without incurring additional expense.

A proposed Order is attached for the Court’s convenience.

August 14, 2024

Respectfully Submitted,

/s/Karl Rupp

Matthew Vella
mvella@princelobel.com
Robert R. Gilman
rgilman@princelobel.com
Aaron S. Jacobs
ajacobs@princelobel.com
James Hall
jhall@princelobel.com
Suhrid Wadekar
swadekar@princelobel.com
PRINCE LOBEL TYE LLP
One International Place, Suite 3700
Boston, MA 02110
Tel: (617) 456-8000
Fax: (617) 456-8100

Karl Rupp
State Bar No. 24035243
SOREY & HOOVER, LLP
100 N. 6th Street, Ste. 502
Waco, Texas 76701
Tel: (903) 230-5600
Fax: (903) 230-5656
krupp@soreylaw.com

COUNSEL for PLAINTIFF

/s/Kat Li

Kat Li
Texas State Bar No. 24070142
kat.li@kirkland.com
Michael T. Dinnella
Texas State Bar No. 24136809
michael.dinnella@kirkland.com
KIRKLAND & ELLIS LLP
401 Congress Avenue
Austin, TX 78701
Tel: (512) 678-9100

Russell E. Levine, P.C.
(admitted in W.D. Tex.)
KIRKLAND & ELLIS LLP

333 West Wolf Point Plaza
Chicago, IL 60654
Tel: (312) 862-2000
russell.levine@kirkland.com

*Attorneys for Defendants and
Counterclaim Plaintiffs TCL
Electronics Holdings Ltd. and
TCL Industries Holdings Co.,
Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's CM/ECF service on this fourteenth day of August, 2024.

/s/Karl Rupp

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

OZMO LICENSING LLC,

Plaintiff,

v.

TCL ELECTRONICS HOLDINGS LTD. and
TCL INDUSTRIES HOLDINGS CO., LTD.,

Defendants.

Civil Action No. 6:23-cv-00249-ADA

**ORDER GRANTING
JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

On this day came to be considered the parties' Joint Motion to Stay All Deadlines and Notice of Settlement. The Court, having considered the evidence contained therein, finds that it has merit and should be GRANTED.

IT IS THEREFORE ORDERED that all deadlines pending in this case are stayed up to and including September 30, 2024.

SIGNED this ____ day of _____, 2024.

Honorable Alan D. Albright
United States District Judge